

Donald S. Zakarin
dzakarin@pryorcashman.com
Ilene S. Farkas
ifarkas@pryorcashman.com
Andrew M. Goldsmith
agoldsmith@pryorcashman.com

PRYOR CASHMAN LLP

7 Times Square
New York, New York 10036-6569

*Attorneys for Defendants Edward Christopher
Sheeran, Atlantic Recording Corporation and
Sony/ATV Music Publishing LLC*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KATHRYN TOWNSEND GRIFFIN, HELEN
MCDONALD, and THE ESTATE OF CHERRIGALE
TOWNSEND,

Plaintiffs,

-against-

EDWARD CHRISTOPHER SHEERAN, p/k/a ED
SHEERAN, ATLANTIC RECORDING
CORPORATION, d/b/a ATLANTIC RECORDS,
SONY/ATV MUSIC PUBLISHING, LLC, and
WARNER MUSIC GROUP CORPORATION, d/b/a
ASYLUM RECORDS

Defendants.

ECF CASE

17-cv-5221 (LLS)

**NOTICE OF MOTION –
DEFENDANTS’ FIFTH
MOTION *IN LIMINE***

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, and all prior proceedings had herein, Defendants Edward Christopher Sheeran (“Sheeran”), Atlantic Recording Corporation (“Atlantic”) and Sony/ATV Music Publishing LLC (“SATV,” together with Atlantic and Sheeran, the “Defendants” and each a “Defendant”) will move this Court, before the Honorable Louis L. Stanton at the Daniel Patrick Moynihan United States Courthouse, Courtroom 21C, 500 Pearl Street, New York, New York, 10007, on a date and time to be determined by the Court, for an Order: excluding any argument or evidence relating to Mr. Sheeran’s general wealth, beyond the revenues

he has generated and costs he has incurred relative to United States exploitation of *Thinking Out Loud*.

The reasons and grounds for this motion are more fully described in the accompanying papers.

Oral argument, if any shall be directed by the Court, shall be held on a date and at a time designated by the Court.

Dated: New York, New York
September 18, 2020

PRYOR CASHMAN LLP

By: /s/ Donald S. Zakarin
Donald S. Zakarin
dzakarin@pryorcashman.com
Ilene S. Farkas
ifarkas@pryorcashman.com
Andrew M. Goldsmith
agoldsmith@pryorcashman.com
7 Times Square
New York, New York 10036-6569
Telephone: (212) 421-4100
Facsimile: (212) 326-0806

Attorneys for Defendants

TO:

Frank & Rice, P.A.
325 West Park Avenue
Tallahassee, Florida 32301
(850) 629-4168
Attorneys for Plaintiffs